

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR  
9004-1(b)**

**GENOVA BURNS LLC**

Daniel M. Stolz, Esq.  
Donald W. Clarke, Esq.  
Matthew I.W. Baker, Esq.  
[dstolz@genovaburns.com](mailto:dstolz@genovaburns.com)  
[dclarke@genovaburns.com](mailto:dclarke@genovaburns.com)  
[mbaker@genovaburns.com](mailto:mbaker@genovaburns.com)  
110 Allen Road, Suite 304  
Basking Ridge, NJ 07920  
Tel: (973) 467-2700  
Fax: (973) 467-8126  
*Local Counsel to the Official Committee of  
Talc Claimants I*

**BROWN RUDNICK LLP**

David J. Molton, Esq.  
Robert J. Stark, Esq.  
Michael S. Winograd, Esq.  
[dmolton@brownrudnick.com](mailto:dmolton@brownrudnick.com)  
[rstark@brownrudnick.com](mailto:rstark@brownrudnick.com)  
[mwinograd@brownrudnick.com](mailto:mwinograd@brownrudnick.com)  
Seven Times Square  
New York, NY 10036  
Tel : (212) 209-4800  
Fax : (212) 209-4801

and

Jeffrey L. Jonas, Esq.  
Sunni P. Beville, Esq.  
Shari I. Dwoskin, Esq.  
[jjonas@brownrudnick.com](mailto:jjonas@brownrudnick.com)  
[sbeville@brownrudnick.com](mailto:sbeville@brownrudnick.com)  
[sdwoskin@brownrudnick.com](mailto:sdwoskin@brownrudnick.com)  
One Financial Center  
Boston, MA 02111  
Tel: (617) 856-8200  
Fax: (617) 856-8201  
*Co-Counsel for the Official Committee of  
Talc Claimants I*

**OTTERBOURG PC**

Melanie L. Cyganowski, Esq.  
Adam C. Silverstein, Esq.  
Jennifer S. Feeney, Esq.  
[mcyganowski@otterbourg.com](mailto:mcyganowski@otterbourg.com)  
[asilverstein@otterbourg.com](mailto:asilverstein@otterbourg.com)  
[jfeeney@otterbourg.com](mailto:jfeeney@otterbourg.com)  
230 Park Avenue  
New York, NY 10169  
Tel: (212) 905-3628  
Fax: (212) 682-6104  
*Co-Counsel for the Official Committee of  
Talc Claimants I*

**PARKINS LEE & RUBIO LLP**

Leonard M. Parkins, Esq.  
Charles M. Rubio, Esq.  
[lparkins@parkinslee.com](mailto:lparkins@parkinslee.com)  
[crubio@parkinslee.com](mailto:crubio@parkinslee.com)  
Pennzoil Place  
700 Milan St., Suite 1300  
Houston, TX 77002  
Tel: (713) 715-1666  
*Special Counsel to the Official Committee of  
Talc Claimants I*

In Re:  <b>LTL MANAGEMENT, LLC,<sup>1</sup></b>  Debtor.	Chapter 11  Case No.: 21-30589 (MBK)  Honorable Michael B. Kaplan
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**NOTICE OF APPEAL AND STATEMENT OF ELECTION<sup>2</sup>**

**Part 1: Identify the Appellant(s)**

- 1. Names(s) of appellant(s):** The Official Committee of Talc Claimants I.<sup>3</sup>
- 2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:** Appellant is an official committee of tort claimants in the underlying bankruptcy case. Appellant is an interested party and an objector in the adversary proceeding.

**Part 2: Identify the subject of this appeal**

- 1. Describe the judgment, order, or decree appealed from:** Appellant, pursuant to 28 U.S.C. § 158(a) and Federal Rule of Bankruptcy Procedure 8001(a), hereby gives notice of

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> Unless otherwise noted, "Dkt." refers to the docket in the main bankruptcy case, 21-30589 (MBK).

<sup>3</sup> The *Objection of the Official Committee of Talc Claimants to Debtor's Motion for an Order (I) Declaring That the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporarily Restraining Order Pending a Final Hearing* (Adv. Proc. No. 21-03032, Dkt. No. 142) (the "Objection") was filed by the original Official Committee of Talc Claimants (the "Original TCC") on December 22, 2021. On December 23, 2021, the United States Trustee filed a notice (Dkt. No. 965) appointing the Official Committee of Talc Claimants I ("TCC I") and the Official Committee of Talc Claimants II ("TCC II") in place of the Original TCC. By Stipulation and Order, entered January 21, 2022 (Dkt. 1226), all pleadings and motions filed by the Original TCC, including the Objection, were deemed to be filed by each of TCC I and TCC II, and each of TCC I and TCC II were permitted to prosecute all such pleadings and motions. On January 26, 2022, the Bankruptcy Court entered an order (Dkt. No. 1273) reinstating the Original TCC but staying the effect of its ruling through March 8, 2022. On March 8, 2022, the Court issued a bench ruling staying the reinstatement of the Original TCC and extending the existence of TCC I and TCC II through and including April 12, 2022. As such, TCC I and TCC II have filed separate notices of appeal. Also during the March 8 hearing, the parties agreed to stipulate that the filings by TCC I and TCC II will be deemed to have been filed by the Original TCC if the Original TCC is reinstated in the future.

appeal to the United States District Court for the District of New Jersey from each and every part of the *Order (I) Declaring That Automatic Stay Applies to Certain Actions Against Non-Debtors and (II) Preliminarily Enjoining Certain Actions* (Dkt. No. 1635) (the “Order”, annexed hereto as **Exhibit A**) entered by the United States Bankruptcy Court for the District of New Jersey.

**2. State the date on which the judgment, order, or decree was entered:** The Order was entered on March 7, 2022.

**Part 3: Identify the other parties to the appeal:**

**List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys:**

Party	Attorneys
Appellant: the Official Committee of Talc Claimants I	<p><b>GENOVA BURNS LLC</b>  Daniel M. Stolz, Esq.  Donald W. Clarke, Esq.  Matthew I.W. Baker, Esq.  <a href="mailto:dstolz@genovaburns.com">dstolz@genovaburns.com</a>  <a href="mailto:dclarke@genovaburns.com">dclarke@genovaburns.com</a>  <a href="mailto:mbaker@genovaburns.com">mbaker@genovaburns.com</a>  110 Allen Road, Suite 304  Basking Ridge, NJ 07920  Tel: (973) 467-2700  Fax: (973) 467-8126</p> <p><b>BROWN RUDNICK LLP</b>  David J. Molton, Esq.  Robert J. Stark, Esq.  Michael Winograd, Esq.  <a href="mailto:dmolton@brownrudnick.com">dmolton@brownrudnick.com</a>  <a href="mailto:rstark@brownrudnick.com">rstark@brownrudnick.com</a>  <a href="mailto:mwinograd@brownrudnick.com">mwinograd@brownrudnick.com</a>  Seven Times Square  New York, NY 10036  Tel : (212) 209-4800  Fax : (212) 209-4801</p> <p>and</p>

	<p>Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. Shari I. Dwoskin, Esq. <a href="mailto:jjonas@brownrudnick.com">jjonas@brownrudnick.com</a> <a href="mailto:sbeville@brownrudnick.com">sbeville@brownrudnick.com</a> <a href="mailto:sdwoskin@brownrudnick.com">sdwoskin@brownrudnick.com</a> One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201</p> <p><b>OTTERBOURG PC</b> Melanie L. Cyganowski, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. <a href="mailto:mcyanowski@otterbourg.com">mcyanowski@otterbourg.com</a> <a href="mailto:asilverstein@otterbourg.com">asilverstein@otterbourg.com</a> <a href="mailto:jfeeney@otterbourg.com">jfeeney@otterbourg.com</a> 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104</p> <p><b>PARKINS LEE &amp; RUBIO LLP</b> Leonard M. Parkins, Esq. Charles M. Rubio, Esq. <a href="mailto:lparkins@parkinslee.com">lparkins@parkinslee.com</a> <a href="mailto:crubio@parkinslee.com">crubio@parkinslee.com</a> Pennzoil Place 700 Milan St., Suite 1300 Houston, TX 77002 Tel: (713) 715-1666</p>
Appellee - Plaintiff: LTL Management, LLC	<p><b>WOLLMUTH MAHER &amp; DEUTSCH LLP</b> Paul R. DeFilippo, Esq. <a href="mailto:pdefilippo@wmd-law.com">pdefilippo@wmd-law.com</a> 500 Fifth Avenue New York, NY 10110 Tel: (212) 382-3300 Fax: (212) 382-0050</p> <p><b>JONES DAY</b> Gregory M. Gordon, Esq. Brad B. Erens, Esq. Dan B. Prieto, Esq.</p>

	<p>Amanda Rush, Esq. <a href="mailto:gmgordon@jonesday.com">gmgordon@jonesday.com</a> <a href="mailto:bberens@jonesday.com">bberens@jonesday.com</a> <a href="mailto:dbprieto@jonesday.com">dbprieto@jonesday.com</a> <a href="mailto:asrush@jonesday.com">asrush@jonesday.com</a> 2727 N. Harwood Street Dallas, TX 75201 Tel: (214) 220-3939 Fax: (214) 969-5100</p>
Defendants (See <b>Exhibit B</b> )	See <b>Exhibit B</b>
Interested party: the Protected Parties (see <b>Exhibit C</b> )	
Interested party/objector: OnderLaw, LLC, on behalf of certain claimants	<p><b>PARKINS LEE &amp; RUBIO LLP</b> Lenard M. Parkins, Esq. Charles M. Rubio, Esq. <a href="mailto:lparkins@parkinslee.com">lparkins@parkinslee.com</a> <a href="mailto:crubio@parkinslee.com">crubio@parkinslee.com</a> Pennzoil Place 700 Milam Street, Suite 1300 Houston, TX 77002 Tel: 713-715-1666</p> <p><b>J.C. WHITE LAW GROUP PLLC</b> James C. White, Esq. <a href="mailto:jwhite@jcwhitelaw.com">jwhite@jcwhitelaw.com</a> 100 Europa Drive, Suite 401 Chapel Hill, NC 27517 Tel: (919) 246-4676 Fax: (919) 246-9113</p>

<p>Interested party/objector: the Objecting Insurers, consisting of the following entities:</p> <p>Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk &amp; Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company ("North River"); Starr Indemnity &amp; Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson &amp; Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and Rheinland Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen).</p>	<p><b>TRIF &amp; MODUGNO, LLC</b>  Louis Modugno, Esq.  <a href="mailto:lmodugno@tm-firm.com">lmodugno@tm-firm.com</a>  89 Headquarters Plaza, Suite 1201  Morristown, New Jersey 07960  Tel: (201) 874-4596</p> <p><b>KATTEN MUCHIN ROSENMAN LLP</b>  Shaya Rochester, Esq.  Katherine Scherling, Esq.  <a href="mailto:shaya.rochester@katten.com">shaya.rochester@katten.com</a>  <a href="mailto:katherine.scherling@katten.com">katherine.scherling@katten.com</a>  575 Madison Avenue  New York, NY 10022  Tel: (212) 940-8800</p> <p><b>MENDES &amp; MOUNT LLP</b>  Eileen McCabe, Esq.  Stephen Roberts, Esq.  <a href="mailto:eileen.mccabe@mendes.com">eileen.mccabe@mendes.com</a>  <a href="mailto:stephen.roberts@mendes.com">stephen.roberts@mendes.com</a>  750 Seventh Avenue  New York, NY 10019  Tel: (212) 261-8000</p>
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<p>Interested party/objector: Aylstock, Witkin, Kreis &amp; Overholtz, PLLC, on behalf of certain claimants</p>	<p><b>OFFIT KURMAN, P.A.</b> Paul J. Winterhalter, Esq. <a href="mailto:pwinterhalter@offitkurman.com">pwinterhalter@offitkurman.com</a> 99 Wood Avenue South, Suite 302 Iselin, New Jersey 08830 Tel: (267) 338-1370 Fax: (267) 338-1335</p> <p><b>KTBS LAW LLP</b> Michael L. Tuchin, Esq. Robert J. Pfister, Esq. Samuel M. Kidder, Esq. Nir Maoz, Esq. <a href="mailto:mtuchin@ktbslaw.com">mtuchin@ktbslaw.com</a> <a href="mailto:rpfister@ktbslaw.com">rpfister@ktbslaw.com</a> <a href="mailto:skidder@ktbslaw.com">skidder@ktbslaw.com</a> <a href="mailto:nmaoz@ktbslaw.com">nmaoz@ktbslaw.com</a> 1801 Century Park East, 26th Floor Los Angeles, California 90067 Tel: (310) 407-4000 Fax: (310) 407-9090</p>
<p>Interested party/objector: Official Committee of Talc Claimants II</p>	<p><b>COOLEY LLP</b> Cullen D. Speckhart, Esq. Michael Klein, Esq. Erica J. Richards, Esq. Lauren A. Reichardt, Esq. Evan Lazerowitz, Esq. <a href="mailto:cspeckhart@cooley.com">cspeckhart@cooley.com</a> <a href="mailto:mklein@cooley.com">mklein@cooley.com</a> <a href="mailto:erichards@cooley.com">erichards@cooley.com</a> <a href="mailto:lreichardt@cooley.com">lreichardt@cooley.com</a> <a href="mailto:elazerowitz@cooley.com">elazerowitz@cooley.com</a> 55 Hudson Yards New York, NY 10001 Tel: (212) 479-6000 Fax: (212) 479-6275</p> <p><b>BAILEY GLASSER LLP</b> Brian A. Glasser, Esq. Thomas B. Bennett, Esq. Kevin W. Barrett, Esq. Maggie B. Burrus, Esq. <a href="mailto:bglasser@baileyglasser.com">bglasser@baileyglasser.com</a> <a href="mailto:tbennett@baileyglasser.com">tbennett@baileyglasser.com</a> <a href="mailto:kbarrett@baileyglasser.com">kbarrett@baileyglasser.com</a></p>

	<p><a href="mailto:mburrus@baileyglasser.com">mburrus@baileyglasser.com</a> 105 Thomas Jefferson St. NW Suite 540 Washington, DC 20007 Tel: (202) 463-2101 Fax: (202) 463-2103</p> <p><b>MASSEY &amp; GAIL LLP</b> Jonathan S. Massey, Esq. <a href="mailto:jmassey@masseygail.com">jmassey@masseygail.com</a> 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467</p> <p><b>WALDREP WALL BABCOCK &amp; BAILEY PLLC</b> Thomas W. Waldrep, Jr., Esq. Kevin L. Sink, Esq. James C. Lanik, Esq. Jennifer B. Lyday, Esq. <a href="mailto:notice@waldrepwall.com">notice@waldrepwall.com</a> 370 Knollwood Street Suite 600 Winston-Salem, NC 27103 Tel: (336) 717-1280 Fax: (336) 717-1340</p> <p><b>SHERMAN, SILVERSTEIN, KOHL, ROSE &amp; PODOLSKY, P.A.</b> Arthur J. Abramowitz, Esq. Alan I. Moldoff, Esq. Ross J. Switkes, Esq. <a href="mailto:abramowitz@shermansilverstein.com">abramowitz@shermansilverstein.com</a> <a href="mailto:amoldoff@shermansilverstein.com">amoldoff@shermansilverstein.com</a> <a href="mailto:rswitkes@shermansilverstein.com">rswitkes@shermansilverstein.com</a> 308 Harper Drive, Suite 200 Moorestown, New Jersey 08057 Tel: (856) 662-0700</p>
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Interested party: United States Trustee	<b>THE OFFICE OF THE UNITED STATES TRUSTEE, ANDREW R. VARA, UNITED STATES TRUSTEE, REGIONS 3 &amp; 9</b> Mitchell B. Hausman, Esq. Jeffrey M. Sponder, Esq. Lauren Bielskie, Esq. Robert J. Schneider, Jr., Esq. <a href="mailto:mitchell.b.hausman@usdoj.gov">mitchell.b.hausman@usdoj.gov</a> <a href="mailto:jeffrey.m.sponder@usdoj.gov">jeffrey.m.sponder@usdoj.gov</a> <a href="mailto:lauren.bielskie@usdoj.gov">lauren.bielskie@usdoj.gov</a> <a href="mailto:robert.j.schneider@usdoj.gov">robert.j.schneider@usdoj.gov</a> One Newark Center, Suite 2100 Newark, NJ 07102 Tel: (973) 645-3014 Fax: (973) 645-5993
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**Part 4: Not Applicable (No BAP in this District)**

**Part 5: Signature**

DATED this 21st day of March 2022.

Respectfully submitted,

**GENOVA BURNS, LLC**

By: 

Daniel M. Stolz, Esq.  
Donald W. Clark, Esq.  
[dstolz@genovaburns.com](mailto:dstolz@genovaburns.com)  
[dclarke@genovaburns.com](mailto:dclarke@genovaburns.com)  
110 Allen Road, Suite 304  
Basking Ridge, NJ 07920  
Tel: (973) 533-0777  
Fax: (973) 467-8126

Local Counsel to the Official Committee of  
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